

Jet Zero™



Our ref: OUT25/3257

16 July 2025

Ulysses Bioenergy Operator Pty Ltd
c/- Northpoint Planning
Attention: Ms Meredith Hutton, Director
hello@northpointplanning.com.au

Dear Ms Hutton

**AP2025/005 – SDA application for a material change of use for a
special industry (sustainable aviation fuel facility) in the
Townsville State Development Area (SDA)**

Receipt of your SDA application for an SDA approval for a material change of use for a special industry (sustainable aviation fuel facility) in the Townsville SDA is acknowledged. The application was deemed properly made on 9 July 2025 in accordance with section 84D of the *State Development and Public Works Organisation Act 1971*.

Please find enclosed a request detailing the additional information required in order to properly assess your application. In accordance with Schedule 2, Part 2, section 2.1(4) of the Townsville SDA Development Scheme (May 2019), your response to the Office of the Coordinator-General is due on or before 15 January 2026. The application will lapse if you do not provide, to the satisfaction of the Coordinator-General, the requested information by the required date.

Once the Coordinator-General has received a response to the request for additional information, the application will be referred to the following referral entities for their assessment and to identify if any further information is required:

- Department of Environment, Tourism, Science and Innovation
- Department of Primary Industries
- Department of Transport and Main Roads
- Office of Industrial Relations
- Ergon Energy
- Townsville City Council
- Port of Townsville.

If the Coordinator-General receives any requests for additional information from the referral entities, the Coordinator-General will coordinate the request and forward it to you for your response.

If you require any further information, please contact Ms Rachel Ritchie, Senior Planner, Office of the Coordinator-General at rachel.ritchie@coordinatorgeneral.qld.gov.au or on (07) 3522 8586, who will be pleased to assist.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Steff Poetzsch'.

Steffen Poetzsch
A/Assistant Coordinator-General
Industry and Infrastructure Development
(as delegate of the Coordinator-General)

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The proponent is required to provide the Coordinator-General with a response to the information requested below. The requested additional information seeks to clarify the scope and impacts of the proposed development. Responding comprehensively to this request may assist in streamlining the assessment process.		
No.	Issue	Information requested
Mapping and site layout		
1	Site access	Section 2.5.1 of the Townsville State Development Area Development Scheme (May 2019) (development scheme) requires that development avoids or minimises adverse impacts on existing or proposed local government infrastructure and services. Planning Report – Development Application – Material Change of Use – Special Industry, reference, 28011007-HSE-REP-00007, revision 0, dated 17 June 2025 (planning report) notes that the site is abutted to the south by an unformed road reserve. The site layout plan (document reference 2811007-PI-PLA-00001_0) and swept paths included in Appendix E of the Jet Zero Townsville Traffic Impact Assessment, prepared by Bitzios, reference P6680.003R, version 003, dated 24 March 2025 (TIA) indicate that site access/egress includes the use of the unformed road to the south. Townsville City Council have confirmed that the rollout of Council infrastructure within the adjoining unformed road reserve is not anticipated in the foreseeable future. If use of the unformed road is proposed, details of how the road will be formed needs to be included in the SDA application. The proponent is requested to: (1) Amend site access arrangements to remove direct access to the unformed road and demonstrate sufficient access through the private access handle. (2) Demonstrate how vehicle manoeuvring will occur onsite without access being available to the unformed road. Alternatively, the proponent is requested to: (3) Provide details on how the road will be formed, including:

		i. the length and width of road to be constructed in accordance with Townsville City Council design standards ii. consideration of environmental and flood impacts iii. in-principle support from Townsville City Council.
2	Elevations	While the planning report includes conceptual development layout images and states the height of some structures on the site, scaled elevations are required to understand the visual and built form impacts of the proposal. Section 2.5.11 of the development scheme requires that the visual impacts are minimised when viewed publicly access viewpoints. The proponent is requested to: (1) Provide plans with an appropriate scale showing indicative elevations of buildings and structures on the site.
3	Laydown area	Section 2.3 of the development scheme requires land to be used efficiently and in a way that does not compromise future development opportunities. The planning report states that the laydown area is a flat cleared area for construction, equipment and logistics. Further explanation about the need for this area and how this area will function after construction, as shown on the site layout plan is required. The proponent is requested to: (1) Provide further detail on the activities proposed to be undertaken in the laydown area.
Services		
4	Connection of services to Colinta Road	Under section 2.5.1 of the development scheme, it is a requirement that development demonstrates it can be adequately serviced. The planning report states that the development will be serviced via connection to Council's services that are currently provided to the Colinta Road frontage of the site. However, it is necessary to understand the extent of works that are required to be undertaken in the access handle to facilitate the provision of services from Colinta Road to the site, taking into consideration the road infrastructure requirements approved as part of OPW24/0107. The proponent is requested to:

		(1) Provide an engineering services report for the development, that includes details of how the development site will connect to Council's services from the Colinta Road frontage.
5	Stormwater/ Flooding	As noted above, the site is abutted to the south by an unformed road reserve. Discussions with Townsville City Council have confirmed that the rollout of Council managed infrastructure within the adjoining unformed road reserve is not anticipated in the foreseeable future. Therefore, stormwater management infrastructure (e.g. diversion swale) identified in the Stormwater Management Plan, file name 12617711-REP-Ulyssis Water Management Report_SMP_3.docx, prepared by GHD Pty Ltd, revision 3, dated 9 April 2025 (stormwater management plan) and flood mitigation infrastructure (e.g. proposed minor levee) identified in the Flood Impact Assessment, report reference MJ2601-FIA, prepared by Northern Consulting Engineers, revision A, dated 17 February 2025 (flood impact assessment) cannot be located within the unformed road, unless in principle support from Townsville City Council has been provided. The proponent is requested to: (1) Amend the stormwater management plan and flood impact assessment to remove stormwater management and flood mitigation infrastructure located in the unformed road to the south, unless in principle support from Townsville City Council has been provided. (2) If in principle support has not been provided by Townsville City Council, alternative stormwater management and flood mitigation measures must be incorporated into the respective reports.
Construction		
6	Construction impacts	While it understood that the specific construction methodology may only be able to be determined through the detailed design stage of the development, it is necessary to understand the scale of off-site impacts that may be anticipated during the construction stage and how these are proposed to be managed or mitigated. In particular, while the access handle is designed to accommodate the operational traffic requirements of the facility, it is unclear if it is designed to accommodate construction vehicles/requirements of the type required for the development. Further, under section 2.5.1 of the development scheme it is necessary for development to avoid or minimise adverse impacts on existing state or local government infrastructure. Therefore, any construction impacts on state and local

		government roads must be addressed, particularly if oversize overmass vehicles are proposed to be used for construction of the development. The proponent is requested to: (1) Provide a preliminary construction management plan that addresses, at a minimum: i. Impacts of construction on state and local roads and how these will be managed or mitigated. ii. Impacts on environmentally sensitive areas from the use of the access handle by construction vehicles and how these will be managed or mitigated.
7	Earthworks	The planning report states that earthworks on the site have been approved by the previous operational works approval OPW24/0107, however section 8.6.8 of the planning report also states that that earthworks will be subject to a future operational works application. Clarification of the extent and location of any additional earthworks required for the development is required. The proponent is requested to: (1) Confirm if any additional earthworks (cut or fill) are required for the development, beyond those approved under the previous operational works approvals OPW22/0066 and OPW24/0107. (2) If additional earthworks are required, provide detail on the location and extent of earthworks that will be undertaken.
Ecological impacts		
8	Clearing of vegetation	Reference is made in the planning report and the Ecological Assessment Report, document number 28011008-HSE-REP-0008, revision 0, dated 8 May 2025 (ecology assessment report) to the existing operational works approval OPW24/0107 for the clearing of vegetation. The SARA referral agency response provided with OPW24/0107 refers to permanent impacts to marine plants of 2,003.4m² within the site. However the ecological assessment report refers to 2,480.5m² of marine plants being disturbed. The proponent is requested to: (1) Confirm if the clearing of native vegetation, marine plants and wetland vegetation will be in accordance with the areas approved by operational works approval (OPW24/0107) and if there is any additional clearing proposed under the current proposal.

		(2) If additional clearing is required, confirm the location, extent and type of vegetation to be cleared.
9	Waterway barrier works	Reference is made in the planning report and ecology assessment report to the existing operational works approval for waterway barrier works (OPW24/0107), however it is unclear if any additional works are required as part of the current proposal. The proponent is requested to: (1) Confirm if any additional waterway barrier works are required to be undertaken for the current proposal other than those approved under the operational works approval OPW24/0107. (2) If additional waterway barrier works are required, confirm their location and type.
10	MNES and MSES	The ecological assessment report has inconsistencies between the sensitive fauna and habitat identified within the development site described at Table 11 and the potential impacts to habitat described in sections 4.1.5, and 4.1.9. For example, Table 11 describes the site as being located within the southern margin of the 'Cleveland Bay' important migratory habitat (fish habitat and migratory shorebirds) and field surveys identified sensitive fauna species protected as MNES and MSES intersecting the project area (including the access road). However the potential and actual impacts described under section 4.1.5 describes that 'loss of core habitat poses the greatest direct threat to MSES' and 'no direct habitat loss or degradation' and 'minor/inconsequential threat'. The proponent is requested to: Confirm the sensitive fauna species and habitat that have been identified as MNES and/or MSES within the development site and surrounding environment, and the potential and/no actual impacts to MNES and/or MSES.
11	Ecological impacts	The ecological assessment report does not provide sufficient details on the threats of the proposal to ecological values. In particular, it is unclear what construction, operational and decommissioning activities may impact on ecological values and limited information is provided on the magnitude, duration and frequency of impacts. There is inconsistency between the mitigation measures and management described under the impact assessment (sections 4.1.1 to 4.1.9) and those mitigation controls identified in section

		4.1.10. For example, section 4.1.2 describes allowing for a buffer distance to habitat to the north, however section 4.1.10.3 does not list the buffer as a mitigation measure. The proponent is requested to: (1) Provide a detailed assessment of the potential and actual impacts on ecological values associated with the construction, operational and decommissioning phases of the development, including the magnitude, duration and frequency of impacts. Please include details of management and mitigation measures that are proposed to be used.
Waste management		
12	Waste management	Under section 2.5.1 of the development scheme, it is a requirement that development in the SDA incorporate waste minimisation practices and considers refuse collection and disposal. The proponent is requested to: (1) Please provide details of waste management practices to be incorporated in the operation of the development.
Fire and explosion impacts		
13	Hazard contours	The FEA report states that hazards are largely contained on-site, however the report contains diagrams that show multiple contours extending beyond the site's boundaries. A visual demonstration of off-site hazard impacts is requested to understand the extent and nature of potential impacts. The proponent is requested to: (1) Provide hazard contours (thermal radiation, explosion overpressure, toxic gas dispersion) relative to site boundaries, land use zones (sensitive/vulnerable/industrial), roads and adjacent facilities (where applicable).

14	Emergency exit	Section 2.3 of the development scheme requires development to manage the risks associated with natural hazards, to protect people and property. Further explanation of how the site will be accessed or egressed in an emergency situation is required. The proponent is requested to: (1) Provide details of any alternative access routes proposed for emergency access/egress if there is an emergency on site that blocks use of the access handle from Colinta Road to the site (e.g. smoke from bushfire, or incident at the site, or flooding).
Advice notes		
If the development includes works to be undertaken in the unformed road abutting the site to the south, landowner consent is required to be provided.		
It is noted that the <i>Environmental Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) approval (EPBC 2020/8810) is for the action “<i>To prepare land and establish infrastructure for a new industrial precinct...</i>” and would not be expected to extend to the current proposal. It is recommended that the proponent undertake a self-assessment for the proposed activity (construction and development of the facility) under the EPBC Act and to engage with the Australian Government Department of Climate Change, Energy, the Environment and Water (pre-referral meeting) to determine whether or not a referral may be required.		
Table 1 of the ecological assessment report states that a species management plan (SMP) is only required where an animal breeding place has been identified within the development footprint. However, Table 10 describes the potential nesting presence of the Eastern Osprey within the development’s receiving environment. Further, based on Figure 12, the breeding place of the double-barred finch appears to possibly intercept with the access road footprint. It is recommended that the proponent discuss the proposal with the Department of Environment, Tourism, Science and Innovation, it to confirm if a SMP is required under the Nature Conservation (Wildlife) Regulation 2006.		